

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE FOREIGN EXCHANGE  
BENCHMARK RATES ANTITRUST  
LITIGATION

No. 13 Civ. 7789 (LGS)

**STIPULATION AND [PROPOSED]  
ORDER**

**WHEREAS**, the Court has given each side 16 hours to present opening statements, direct examination, and cross examination (ECF No. 1840 at 2);

**WHEREAS**, the Court has encouraged the parties to stipulate to facts not in reasonable dispute and to take measures to streamline the upcoming October 11, 2022, jury trial to maximize efficiency and minimize juror inconvenience;

**WHEREAS**, Plaintiffs included Plaintiff Oklahoma Firefighters Pension and Retirement System (“Oklahoma Firefighters”) and Plaintiff Board of Pensions and Retirement, Employees’ Retirement System of the Government of the Virgin Islands (“Virgin Islands”) on their trial witness list to testify about their respective responsibilities as class representatives and their FX trading with Defendant banks, including Credit Suisse (ECF No. 1853 at 10–11);

**WHEREAS**, the Parties believe that it is undisputed that that Oklahoma Firefighters and/or Virgin Islands, engaged in foreign exchange transactions with Credit Suisse and one or more of the other 15 settling Defendants during the Class Period;

**WHEREAS**, the Parties believe that valuable trial time could be better spent on disputed issues;

**WHEREAS**, the Parties have met and conferred in good faith to agree on an orderly process for testimony at trial;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between counsel for the Parties, as follows:

1. Neither Party will call Oklahoma Firefighters and/or Virgin Islands (or any other named Plaintiff) as witnesses at trial; and

2. That Oklahoma Firefighters and Virgin Islands traded FX during the Class Period with Credit Suisse and one or more of the other 15 settling Defendants is an undisputed fact that will be presented to the jury before trial.

Dated: October 1, 2022

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DATED: \_\_\_\_\_

**SO ORDERED:**

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HON. LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE